

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**NOTICE OF RREF III STORAGE LLC'S MOTION FOR ENTRY OF AN ORDER  
DISMISSING THE DEBTOR'S CHAPTER 11 CASE WITH PREJUDICE AND  
GRANTING RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE that on April 26, 2021, RREF III Storage LLC (“RREF”) filed the *Motion for Entry of an Order Dismissing the Debtor’s Chapter 11 Case with Prejudice and Granting Relief from the Automatic Stay* (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Court”), pursuant to which RREF seeks the entry of an order (i) dismissing the chapter 11 case of the above-captioned debtor (the “Debtor”) for cause and with prejudice pursuant to section 349(a) of the Bankruptcy Code and (ii) granting relief from the automatic stay pursuant to sections 362(d)(1) and (d)(2) of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON A DATE TO BE DETERMINED BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5<sup>th</sup> FLOOR, COURTROOM 6, WILMINGTON, DELAWARE 19801.

You are required to file a response (and the supporting documentation required by Local Rule 4001-(c)) to the attached Motion prior to the Objection Deadline (as defined below).

PLEASE TAKE FURTHER NOTICE that objections, if any, to the entry of an order approving the Motion must be (a) in writing and served on or before **May 17, 2021 at 4:00 p.m.** (prevailing Eastern Standard Time) (the “Objection Deadline”); (b) filed with the Clerk of the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801; and (c) served as to be received on or before the Objection Deadline by counsel to RREF at the addresses set forth below.

1 The Debtor in this chapter 11 case, together with the last four digits of the Debtor's taxpayer identification  
number, is as follows: GVS Portfolio I B, LLC (7171). The Debtor's mailing address is 814 Lavaca Street,  
Austin, TX 78701.

PLEASE TAKE FURTHER NOTICE THAT only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE THAT the hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

PLEASE TAKE FURTHER NOTICE THAT the attorneys for the parties shall confer with respect to the issues raised by the Motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: April 26, 2021  
Wilmington, Delaware

**SAUL EWING ARNSTEIN & LEHR LLP**

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